

Attorney for Plaintiff

)	CASE NO. 2:16-cv-02747-JAD-VCF
)	
ROSALIND BROWN,)	
)	STIPULATION AND REQUEST TO
Plaintiff,)	EXTEND DISCOVERY AND OTHER
)	DEADLINES
vs.)	
)	(Seventh Request)
)	
RESORTSTAY INTERNATIONAL, LLC, a)	
Nevada Limited Liability Company;)	
STARPOINT RESORT GROUP, INC., A)	
Nevada Corporation,)	
)	
Defendant.)	

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1 This request is being made timely in accordance with LR 26-4 and the prior scheduling
2 order which provides that requests for further discovery extensions must be made no later than
3 twenty-one (21) days before the existing discovery cut-off date, or here by August 17, 2018. This
4 is the seventh request for an extension.

5 This stipulation is made and based upon the following factors.

6 To date the parties have both made their initial disclosures to the other side and Plaintiff
7 has propounded interrogatories and requests for production of documents to Defendant which they
8 have provided responses to and Defendant has propounded interrogatories and requests for
9 production of documents to Plaintiff which are being responded to shortly. Further the parties are
10 currently meeting and conferring about further production of documents by Defendant.

11 Finally Defendant's counsel has taken the deposition of Plaintiff to date and Plaintiff's
12 counsel has taken the depositions of Richard Braglia and Frank Braglia to date and intends to
13 dispose James Danz, Brad Benson, Darren Horvath, Jessica Carranza-Sanchez, Angelica
14 Talamaya, Shelly Brittell and Miranda Cox.

15 The parties and their attorneys have diligently worked to complete discovery as
16 expediently as possible but because a number of the employees no longer work for Defendant and
17 in some cases now live out of state, it has been difficult to schedule all the dispositions in a timely
18 manner.

19 Thus with the discovery cut-off less than a month away and at least seven depositions still
20 to be taken and written discovery not completed, it seems unlikely that all the required discovery
21 can be completed by the current discovery deadline.

22 Assuming this request is granted, the parties have tentatively set aside the weeks of
23 September 10th and 17th to conduct the remaining depositions, and anticipate most will be
24 completed in those weeks.

25 This being the case, the parties request that the discovery cut-off and related dates be
26 extended as follows:
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1	<u>Activity</u>	<u>Former Date</u>	<u>Requested Date</u>
2	Discovery Cut-Off Date	09/07/18	11/06/18
3	Dispositive Motions	10/08/18	12/07/18
4	Pretrial Order	11/07/18	01/07/19 ¹

5 In accordance with LR 26-4 the parties understand that any further requests to extend a
6 deadline set forth in the discovery plan and scheduling order must be made no later than twenty-
7 one days before the new proposed discovery cut-off date, i.e., November 6, 2018, or no later than
8 twenty-one days before any other deadline sought to be extended. Any requested thereafter shall
9 only be granted with a showing of cause.

10 This Stipulation to Extend Discovery and Other Deadlines is not submitted for purposes of
11 delay.

12 For all the reasons stated above, good cause exists to extend the discovery cut-off in this
13 matter.

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16 LAW OFFICES OF MICHAEL P.
17 BALABAN

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.


18 /s/ Michael P. Balaban
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Attorney for Defendant

23 Dated: August 16, 2018

Dated: August 16, 2018

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: 8-20-2018

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28 ¹ In the event dispositive motions have been filed, the Pretrial Order shall be suspended until thirty (30) days after a
decision on the dispositive motions or further order of the Court.